

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

INNOVATION SCIENCES, LLC,

Plaintiff,

v.

AMAZON.COM, INC., et al.,

Defendants.

CASE NO. 4:18-cv-00474-ALM

(LEAD CONSOLIDATED CASE)

JURY TRIAL DEMANDED

INNOVATION SCIENCES, LLC,

Plaintiff,

v.

VECTOR SECURITY, INC.,

Defendant.

CASE NO. 4:18-cv-00477-ALM

JURY TRIAL DEMANDED

**JOINT MOTION TO EXTEND EXPERT REPORT DEADLINES
IN THE CASE AGAINST VECTOR SECURITY, INC.**

Plaintiff Innovation Sciences, LLC (“Innovation”) and Defendant Vector Security, Inc. (“Vector”) respectfully move for a thirty-day extension of all expert report deadlines and the expert discovery deadline for Innovation and Vector in case no. 4:18-cv-00477. In support of this joint motion, the parties would show the Court as follows:

1. Innovation and Vector are engaged in settlement discussions and would benefit from an extension of the deadlines for expert reports so that the parties can focus their efforts on continuing to attempt a resolution of this case.

2. The upcoming holiday season will make it more difficult to resolve this case with key individuals spending time away from the office.

3. The requested extension is not sought for any improper purpose and would not unduly prejudice any party to this suit.

4. The parties have conferred and agree to this extension in order to provide time to focus on settlement discussions.

5. This is the second request for an extension of this nature before the Court.

6. The parties therefore respectfully request that the Court grant this motion and extend in case no. 4:18-cv-00477:

- The deadline for opening expert reports from December 18, 2019 to January 17, 2020
- The deadline for rebuttal expert reports from January 29, 2020 to February 28, 2020
- The deadlines for Daubert motions for the respective reports by thirty days
- The deadline for expert discovery from February 12, 2020 to March 13, 2020

Dated: December 18, 2019

Respectfully submitted,

By: /s/ Donald L. Jackson
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**ATTORNEYS FOR DEFENDANT
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on December 18, 2019, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule 5(a)(3).

/s/ Donald L. Jackson
Donald L. Jackson